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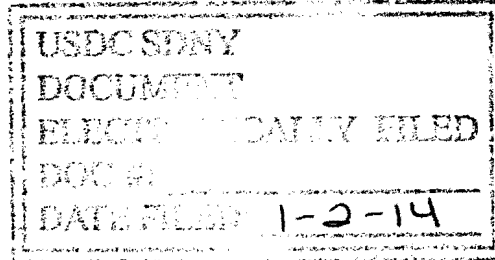
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December 20, 2013

2013

Honorable Loretta A. Preska
United States District Chief Judge
United States District Court
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007



Re: **The American Medical Association, et al. v. United HealthCare Corp., et al., Case No. 00 Civ. 2800 (LMM) (GWG)**

Dear Judge Preska:

As per my office's conversation with the Clerk of Court this morning, enclosed please find a letter addressed to Judge McKenna requesting formal approval for the final distribution of settlement funds in the above-mentioned matter. Judge McKenna approved the settlement by Order of October 10, 2010.

Thank you for your cooperation in this matter. Please do not hesitate to contact me should you need any further information.

Respectfully submitted,

s/ D. Brian Hufford
D. Brian Hufford

Enclosures

cc: Stanley M. Grossman, Esq.
Robert J. Axelrod, Esq.
Michael Rosenbaum, Berdon Claims Administration
Counsel for Defendants (Jeffrey S. Klein, Esq.
and Nicholas J. Pappas, Esq.)

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December 20, 2013

Honorable Lawrence M. McKenna
United States District Judge
United States District Court
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: **The American Medical Association, et al. v. United HealthCare Corp., et al., Case No. 00 Civ. 2800 (LMM) (GWG)**

Dear Judge McKenna:

This firm is Lead Settlement Counsel for the Settlement Class in the above-referenced litigation. We are writing to request formal approval for the final distribution of the remaining settlement funds obtained in the above-captioned litigation.

As stated in the attached Affidavit of Michael Rosenbaum, the Net Settlement Fund has a current balance totaling \$1,067,694.54. We are requesting authority to reissue certain stale settlement checks, totaling \$41,948.00, representing the checks that a total of 311 Authorized Claimants have requested due to having lost previously issued checks. That would then leave \$1,025,746.54 in unreimbursed funds.

Of that total, \$500,000 is to be allocated to a Joint Insurer-Provider Institute, as provided for in Section 3.2 of the Settlement Agreement, which provides as follows:

3.2 Joint Insurer-Provider Institute

The Escrow Agent shall pay up to a maximum of Five Hundred Thousand Dollars (\$500,000) to a Joint Insurer-Provider Institute from interest accruing on the Cash Settlement Fund. The Joint Insurer-Provider Institute shall be used by the Company and the AMA to facilitate cooperation between private sector healthcare insurers and healthcare providers in the delivery of patient healthcare.

The American Medical Association ("AMA") and United are in the process of finalizing an agreement with respect to the allocation of the \$500,000 to be paid to the Joint Insurer-Provider Institute. Once that process is completed, we will notify the Court. After allocating that amount, however, a total of \$567,694.54 remains in the Settlement Fund.

Honorable Lawrence M. McKenna
December 20, 2013

Pursuant to Section 3.3 of the Settlement Agreement, "settlement funds remaining after distribution to the Settlement Class in an amount that the Court determines is economically impracticable to distribute shall be donated to one or more non-profit health-related organizations that are: (i) designated by Settlement Class Counsel; (ii) consented to by Defendants (whose consent shall not be unreasonably withheld); and (iii) approved by the Court." As previously reported to the Court, distributions were made to a total of 474,839 claimants in the actions. As a result, we request that the Court find that it would "economically impracticable" to distribute these remaining funds to Settlement Class members and therefore seek authorization to distribute these funds to appropriate charities.

We have identified the following charities we would like to use, all of which are tied to health care issues: (1) the National Multiple Sclerosis Society, New York City-Southern New York Chapter; (2) the Fisher Center for Alzheimer's Research Foundation; (3) the Rebuilding New York and New Jersey's Healthcare Safety Net Project of Direct Relief International; and (4) the Childhood Obesity Program for Mount Sinai's Kravis Children's Hospital. Our intent is to divide the remaining funds equally between these organizations. United has consented to these charities for the final distribution of unused funds.

We request that the Court sign below to indicate that the final distribution of remaining funds, as detailed herein, is approved. Prior to contributing the remaining \$500,000 to the Joint Insurer-Provider Institute, we will inform the Court of the agreement between the AMA and United. We anticipate that this will be completed within two months. Please let us know if you need further information.

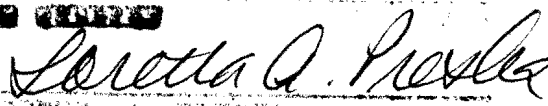
Respectfully submitted,

s/ D. Brian Hufford

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Enclosures

cc: Stanley M. Grossman, Esq.
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Michael Rosenbaum, Berdon Claims Administration
Counsel for Defendants (Jeffrey S. Klein, Esq.
and Nicholas J. Pappas, Esq.)


JOSEPH A. PYSKA
UNITED STATES DISTRICT COURT
December 23, 2013

Honorable Lawrence M. McKenna
December 20, 2013

SO ORDERED this _____ day of _____, 2013.

Honorable Lawrence M. McKenna
United States District Judge